

### About this Statement

This Statement provides our stakeholders with an account of the approach and actions we took to assess and address modern slavery risks in our operations, business activities and value chain during 2024.

#### **Scope of this Statement**

This Statement is made in accordance with the United Kingdom's *Modern Slavery Act 2015* (UK MSA). It covers the period 1 January 2024 to 31 December 2024. It is made on behalf of the UK MSA reporting entities listed in Appendix I.

This Statement is also made in accordance with Australia's *Modern Slavery Act 2018* (Commonwealth) (Australian MSA) for a single reporting entity (Anglo American Technical & Sustainability Services Ltd (AAT&SS)) for the period 1 January 2024 to 31 December 2024. AAT&SS is incorporated as a company in the UK. It provides management, technical and consultancy services to certain companies in the Anglo American Group ('the Group'). AAT&SS operates under the policies and processes outlined in this Statement, and the information about supply chains, modern slavery risks, risk management actions and steps to assess effectiveness outlined in this Statement are applicable to AAT&SS.

The disclosures in this Statement apply in relation to all reporting entities and their owned and controlled entities unless otherwise specified. A table setting out how this Statement addresses the UK MSA and Australian MSA reporting criteria can be found in Appendix II. For information regarding the Group terminology, forward-looking statements and third-party information, please refer to the inside back cover of this document.

Unless otherwise specified, all data in this report is aggregated to include all entities in the Anglo American Group, including those making separate statements as outlined below.

#### Reporting by other relevant entities

Due to the upcoming sale of Anglo American's Steelmaking Coal business, a separate statement is being made by the relevant Steelmaking Coal entities in accordance with the Australian MSA.

A separate Modern Slavery Statement is also being made by De Beers and its relevant owned and controlled entities pursuant to section 54 of the UK MSA, and a further statement is being made by De Beers Canada Inc. pursuant to section 11(1) and 11(2) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (Canadian FLCLA).

#### Consultation to prepare this Statement

All reporting entities listed in Appendix I were consulted in developing this Statement, including through consultation with the relevant company secretary. As outlined below, the boards of selected relevant entities also reviewed and approved this Statement, including AAT&SS. In preparing this Statement, we also consulted with and obtained input from relevant functions and businesses across the Group, including Supply Chain, Marketing, and Business Assurance Services. These functions' responsibilities cut across the different entities covered by this Statement, including AAT&SS's (the sole reporting entity under the Australian MSA) owned and controlled entities.

The consultation process outlined above helped to ensure that the Statement reflects our Group's approach to identifying, preventing, mitigating and accounting for modern slavery risks. This Statement was approved by the Board of Anglo American plc (the Board) on 4 June, 2025 under section 54(6)(a) of the UK MSA and by each of the boards of Anglo American Services (UK) Ltd and AAT&SS, on 6 June, 2025, Anglo American Marketing Limited on 3 June, 2025, Kumba International Trading Limited on 10 June 2025, and Anglo Platinum Marketing Limited on 29 May 2025. The board of AAT&SS also approved this Statement under section 14(2)(d)(ii) of the Australian MSA on 6 June, 2025.

This Statement has been signed below by Duncan Wanblad, Chief Executive of Anglo American plc.

1 Section .

**Duncan Wanblad**Chief Executive

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### Our reporting suite

You can find this report and others, including the Integrated Annual Report, the Climate Change Report, our Tax and Economic Contribution Report and the Ore Reserves and Mineral Resources Report, on our corporate website.

► For more information, visit: angloamerican.com/reporting

### FutureSmart Mining™

Helping us live up to our Purpose, FutureSmart Mining is our integrated approach to sustainability and innovation to deliver improved environmental and social outcomes.

► For more information, visit: angloamerican.com/futuresmart

#### **Social channels**

4 AngloAmerican

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in Anglo American



o angloamericanplc

# Message from the Chief Executive



How metals and minerals are produced is ever more important to all stakeholders, from local communities to our customers and the ultimate consumer – and rightly so. We are ever mindful of how our activities can affect the rights of people – through impacts on the health and safety of our workforce, working conditions for our suppliers' workers, the environment or the well-being of communities – and how those impacts can change and evolve over time.

#### Addressing our human rights risks

We are proud of the role we play in respecting and supporting human rights – through promoting safe and decent work, our commitment to responsibility, compliance, and transparency in taxation, or through improving health, livelihoods and education in host communities through our Sustainable Mining Plan. It is also true that some of our activities have the potential to adversely affect human rights. We are committed to the safety and health of our workforce while striving to minimise harmful effects on the environment and communities, including being mindful of the potential human rights impacts related to security services. We also recognise that human rights impacts can occur in our supply chain, and we continue to build our understanding and management of relevant human rights risks such as modern slavery and child labour across our supply chain, which includes a network of more than 13,000 suppliers around the world. We strive to embed respect for human rights as a foundation of the approaches and standards that we apply throughout our business and value chains.

#### The changing landscape of business and human rights

The human rights and business landscape is dynamic and encompasses an evolving regulatory landscape with increasing scrutiny on human rights due diligence and management of forced labour risks. We are mindful of the need for continuous improvement both in terms of managing risks to rights holders, and disclosure of actions taken to ensure stakeholders can access the information they need.

#### **Tackling modern slavery**

A number of challenging global developments have increased the economic and social vulnerability of many people around the world. As the number of people experiencing modern slavery is thought to be increasing on a global basis, the International Labour Organization (ILO) estimated recently that the annual illegal profits from this exploitation amount to US\$236 billion. As vulnerability invariably underpins the incidence of modern slavery, we are ever more conscious of the importance of understanding and addressing modern slavery risks in our business and in relation to our business relationships. We have continued to review our management processes to identify areas for strengthening to address risks associated with modern slavery hotspots, while at the same time we updated our Responsible Sourcing Standard to make expectations simpler and more accessible for suppliers. We also continue to work with strategic supplier partners related to procurement of heavy equipment to enhance supplier due diligence around modern slavery risks.

Addressing modern slavery is complex, and of course we have more to understand. We are learning from others and are committed to monitoring and evaluating our own actions to help ensure how we identify risks, prevent impact and remediate as necessary, improves over time. As we simplify our portfolio and organisation, our priorities are to ensure ongoing clarity in roles and responsibilities to identify and address modern slavery risks, strengthening monitoring and close-out of improvement actions with suppliers, and improving our understanding of how suppliers manage workforce grievances. We will continue to leverage technology to support our teams to deliver our risk management approach. I am pleased to sign and present this statement, and thank the Board, our people and all those with whom we work for their support and partnership in 2024.

**Duncan Wanblad**Chief Executive

# Summary

At Anglo American, we are guided by our Purpose - re-imagining mining to improve people's lives to deliver sustainable value for all our stakeholders. We are transforming the very nature of mining for a safer, smarter, more sustainable future.

Companies have a responsibility to prevent and address modern slavery (including forced labour) in their operations and along their value chains. Demand for responsibly sourced products, including those needed for the energy transition, continues to contribute to scrutiny on how companies, including in the mining sector, assess and address these risks.

This Statement outlines the approach and actions Anglo American took to assess and address modern slavery risks in our operations and value chain (including supply chain) in 2024. It outlines the policies we have in place, the practical steps we have taken, key achievements, and priorities for the year ahead.

This is our eighth Modern Slavery Statement published in compliance with the UK MSA and our fifth Modern Slavery Statement in compliance with the Australian MSA. (In 2020, our Steelmaking Coal business published a separate statement in compliance with the Australian MSA and will do so again this year.)

Our endeavours to address modern slavery and work towards ensuring that our value chain is free from exploitation form part of our broader work to identify and address human rights risks. We recognise our responsibility to respect all internationally recognised human rights and have embedded our commitment to do so in our Group Human Rights Policy. Further information about our approach to human rights, including our recent achievements and priorities, is available in our Sustainability Report 2024.

#### Progress against our 2023 focus areas

We have made positive progress on achieving commitments for 2024 that we published in our 2023 Modern Slavery Statement.

### 2024 focus greas (as reported in 2023)

2024 focus areas (as reported in 2023)	Status
Progressing our gap analysis of our modern slavery risk management and identifying priorities for further action.	Ongoing
Updating the supplier self-assessment questionnaire (SAQ) tool to automate feedback to suppliers.	Ongoing
Continuing to develop and launch human rights training modules (including in relation to modern slavery) tailored to specific business functions.	Ongoing
Refining operational due diligence guidance, with human rights considerations continuing to be integrated into operational and functional plans.	Ongoing
Continuing to engage with our stakeholders on human rights issues, such as modern slavery.	Ongoing
Commencing development of a human rights monitoring and accountability framework.	Work to commence in 2025*
Continuing engagement with the sector to promote consistent approaches to supplier engagement.	Ongoing
Continuing supplier capacity development programmes aimed at increasing suppliers' awareness, and promoting practical controls that suppliers can implement to mitigate modern slavery risk.	Ongoing

\* With the acceleration of Anglo American's strategy and portfolio changes, some activities planned for 2024 were postponed.

#### Highlights in 2024

Through our responsible-sourcing programme, we aim to ensure that those we do business with follow a set of minimum standards for responsible business conduct, that are comparable to what we expect of ourselves. In 2024, we updated our Responsible Sourcing Standard for Suppliers to reinforce our expectations around how suppliers assess and address modern slavery risks in our value chain, including in relation to eliminating all trafficked, forced, bonded and involuntary prison labour.

#### ► For more on responsible sourcing, See page 16

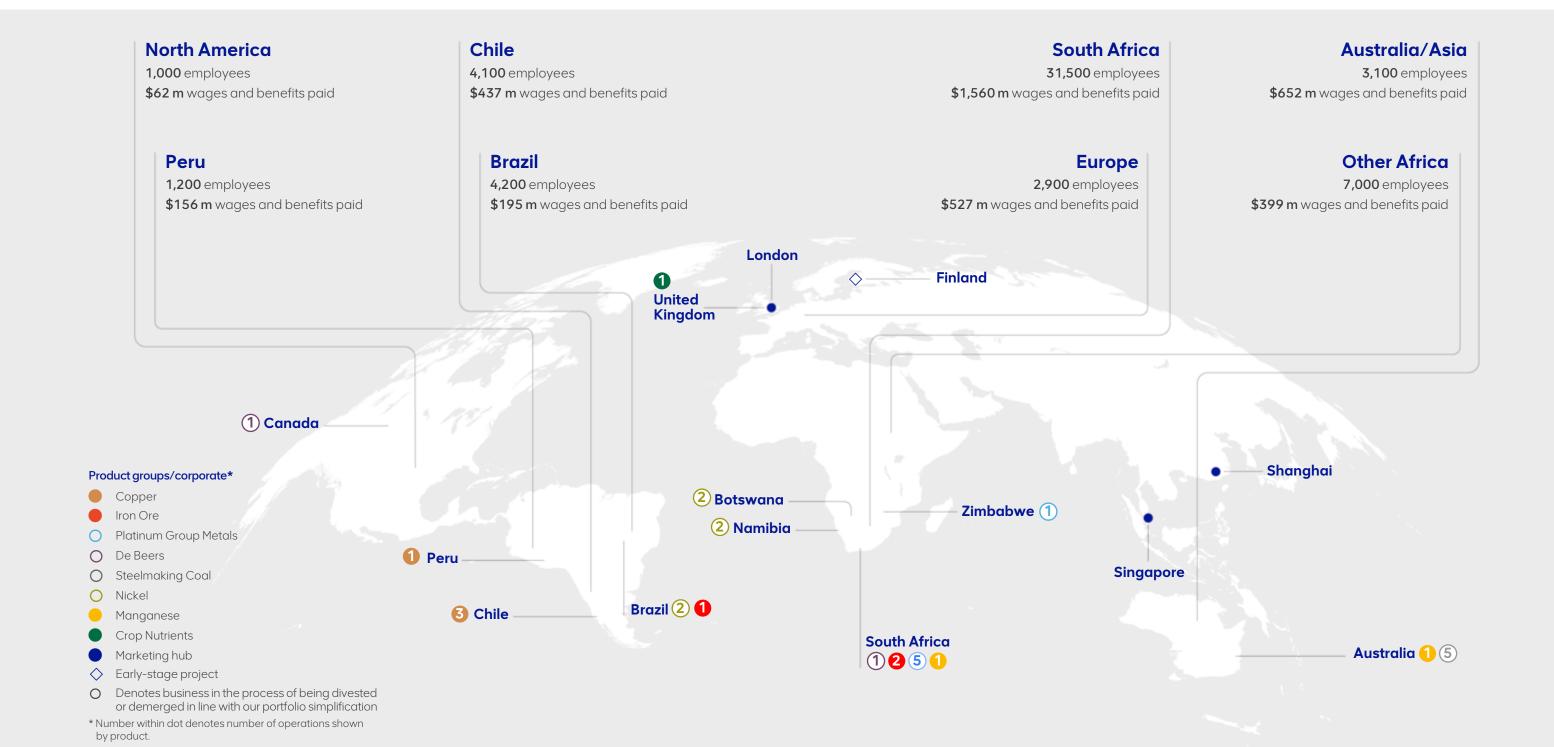
Recognising the value of partnerships in addressing complex risks, we formally commenced a three-year partnership with the Slave Free Alliance, a global NGO that supports organisations to optimise their efforts around responsible supply chain practices and the elimination of modern slavery. In 2024, Slave Free Alliance supported a process of extensive document review and internal engagement with over 70 individuals across the business to objectively benchmark our maturity and management of supply chain related human rights issues, allowing us to identify enhancements to management systems, supplier selection and risk assessments, contracting processes, ongoing risk monitoring, integration of worker voice and supplier capability development. This work will continue in 2025.

In 2024, we undertook an internal review of our approach to human rights due diligence across the company. The review mapped our Group-level salient risks (safety and health of employees and contractors, environmental management, impacts on communities, security and human rights and labour rights) to functions and business processes. Considering the outputs from the 2022 modern slavery hotspot analysis (more information below), we identified priorities to strengthen human rights due diligence activities over time. The findings of the review were discussed with Anglo American's cross-disciplinary Human Rights Working Group to confirm priorities for discussion with the Board's Sustainability Committee.

- For more on next steps on modern slavery hotspots,
- ▶ For more on Governance and the Human Rights Working Group, See page 10

# Our business at a glance

Anglo American is a leading global mining company with a portfolio of worldclass mining and processing operations and outstanding mineral endowments, offering significant value-accretive growth optionality, with around 55,000 employees working for us around the world.



### Our business model

Anglo American draws upon a number of key inputs that, through targeted allocation, development, extraction and marketing, create sustainable value for our shareholders and our diverse range of stakeholders.

**Our inputs** Our value chain **Outputs** 

#### **Ore Reserves and Mineral Resources**

Our high-quality, long-life mineral assets provide a range of organic options for long-term value delivery.

#### Other natural resources

We aim to effectively manage the water and energy requirements of our mining and processing activities.

#### **Know-how**

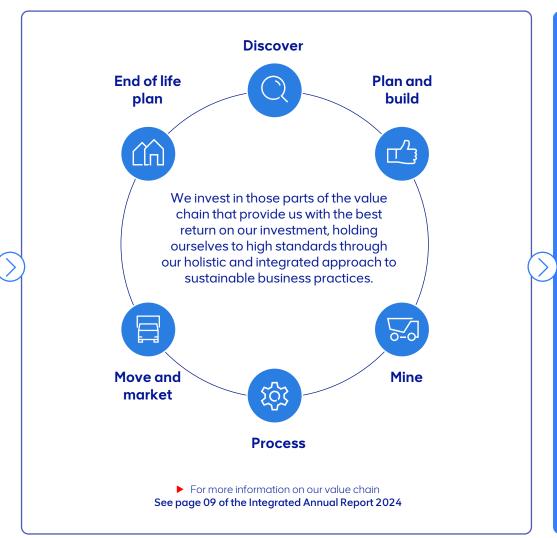
We use our industry-leading technical, sustainability and market knowledge to realise optimal value from our assets.

#### Plant and equipment

We form strong relationships with suppliers, many of whom are located in the countries where we operate, to deliver tailored equipment and operating solutions.

#### Financial

A strong focus on productivity, cost discipline and working capital management helps deliver sustainable positive cash flows, with balanced capital allocation to optimise returns.



We provide many of the precious metals and minerals our modern society needs for improving living standards and food security in a cleaner, greener and decarbonising world. We combine integrity, creativity, and smart innovation, with the utmost consideration for our people, their families, local communities, our customers and the world at large – to better connect precious resources to all of us who need and value them.

Attributable free cash flow

\$0.5 bn

Group attributable ROCE

CO<sub>2</sub> equivalent emissions (Scope 1 and 2) Mined product shipped by our fleet

11.6 Mt

>75 Mt

#### Production in 2024

- Copper: **773 kt**
- Iron ore: **60.8 Mt**
- Platinum: **1.846 koz refined**
- Diamonds: 24.7 Mct
- Steelmaking coal: 14.5 Mt
- Nickel (from Nickel and PGMs): **65.2 kt**
- Manganese ore: 2.3 Mt
- Palladium: **1,249 koz refined**
- Rhodium: 248 koz refined

#### Governance

Our governance controls ensure we respond effectively to those matters that have the potential to cause financial, operational or reputational harm, while acting ethically and with integrity.

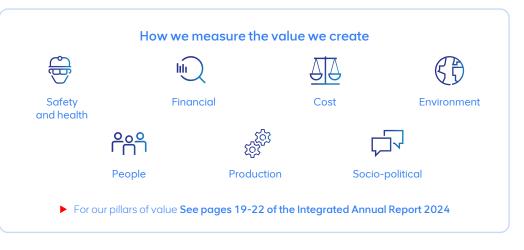
▶ For more information

See pages 155–191 of our Integrated Annual Report 2024

#### Materiality and risk

Identifying and understanding our material matters and risks is critical in the development and delivery of our strategy.

► For our more information our Integrated Annual Report 2024



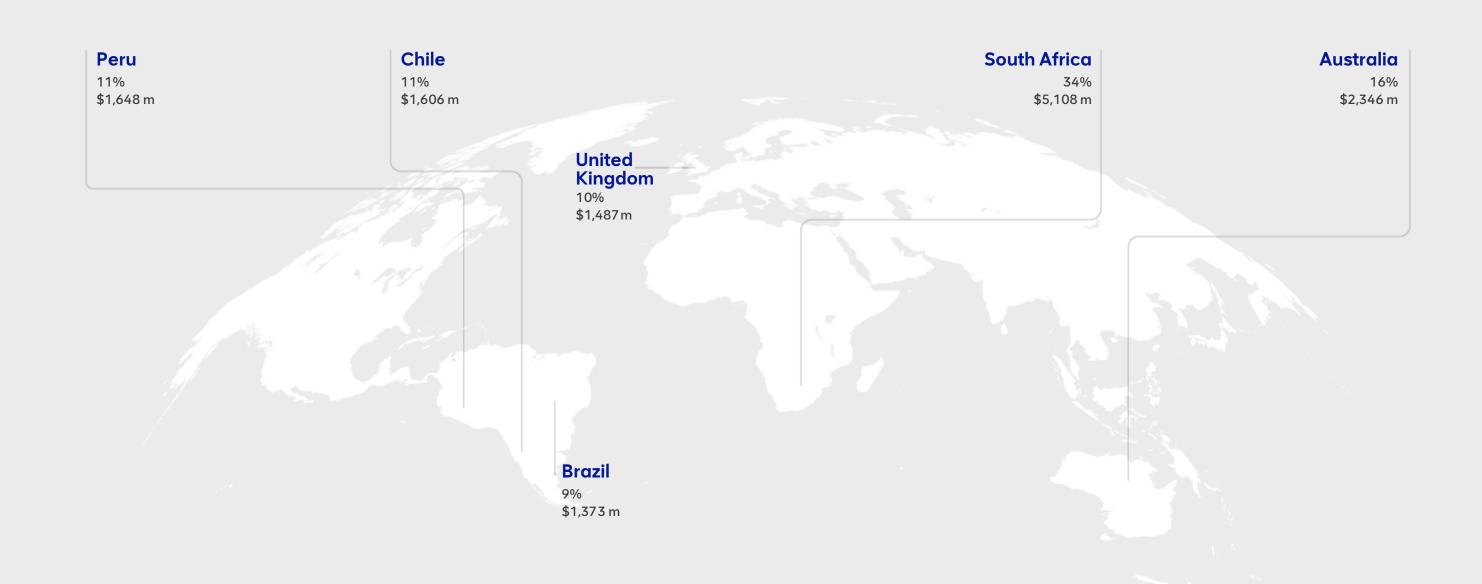
#### Stakeholder engagement

Open and honest engagement with our stakeholders is critical in gaining and maintaining our social and regulatory licences to operate. Working within our social performance framework, it is our goal to build and sustain constructive relationships with host communities and countries that are based on mutual respect, transparency and trust.

► For more information See pages 16–19 of the Integrated Annual Report 2024

# Tier one supplier locations by spend

reflecting 90% of spend





# Embedding our commitments

As a prominent global mining company, we operate in complex environments and in a range of geographies and jurisdictions. We are conscious that there is a range of potential modern slavery and child labour risks across many parts of our business model – and that these may change over time in our rapidly changing business context.



#### Modern slavery, including the worst forms of child labour

Describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

#### **Examples include:**

- Children trafficked to work in factories in unsafe conditions.
- Workers trapped in their employment, with employers having confiscated identity documents, such as passports.

#### Child labour and other dangerous or sub-standard working conditions

Child labour is any work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. Dangerous or substandard working conditions include work that is unsafe or inappropriately compensated.

#### **Examples include:**

- Workers are not fairly paid and do not receive any or some of their entitlements.
- Children are required to leave school in order to work and to support their families.

#### **Decent work**

Workers' rights are respected and there is no child work.

#### **Examples include:**

- Workers are paid fairly, including for any overtime.
- The workplace is safe and workers are provided with appropriate training and personal protective equipment.

### How can we be involved in modern slavery or child labour?

In assessing our risk of involvement in modern slavery and child labour, we use the continuum of involvement set out in the UN Guiding Principles on Business and Human Rights (UNGPs). This continuum of involvement guides our understanding of how we could potentially be involved in modern slavery and child labour, and how we should respond.

#### Continuum of involvement

#### Cause

A mining company may cause modern slavery or child labour in its operations where its actions or omissions directly result in modern slavery practices occurring.

For example, a mining company could cause child labour if it does not conduct appropriate age verification for local employees and knowingly employs workers below the legal working age.

#### Contribute

A mining company may contribute to modern slavery or child labour in its operations or supply chain through its actions or omissions, including where these facilitate or incentivise modern slavery or child labour in its supply chain.

For example, a mining company could contribute to modern slavery if it is aware of a sub-contractor exploiting migrant workers through debt bondage and does not take any steps to address the abuse.

### Directly linked

A mining company's operations, products or services may be directly linked to modern slavery or child labour through its business relationships.

For example, a mining company could be directly linked to modern slavery if it sources PPE from a supplier using raw materials harvested by a third supplier using forced or child labour.

#### Degree of involvement

In line with the UNGPs'continuum of involvement, we assess we are mostly likely to be directly linked to modern slavery in the hotspots identified through our 2022 analysis (see section below for more details). We recognise that if our policies, processes, and other controls outlined in this statement are not effective, this could potentially increase our risk of causing or contributing to modern slavery and child labour.



### Governance

Anglo American is committed to ensuring effective governance and oversight of our efforts to assess and address modern slavery, child labour and other human rights-related risks.

Our Sustainability Committee, on behalf of the Board:

- Oversees Group-level policies, processes and strategies designed to manage safety, health and well-being, environment, social and human rights, socio-political, and supply chain risks
- Aims to achieve compliance with sustainable development responsibilities and commitments
- Strives to ensure Anglo American continues to be a global leader in sustainable mining, including by maintaining our focus on respect for human rights.

The Sustainability Committee has visibility of risks and opportunities related to human rights across the Group, including modern slavery and child labour. A human rights update is provided to the Executive Leadership Team (the team that provides advice and support to the Anglo American plc chief executive on the critical business matters required to shape the Group) and the Board's Sustainability Committee at least annually, with additional topics presented and discussed as the need arises. In 2024, the Board's Sustainability Committee received a comprehensive briefing on key human rights trends and potential implications for Anglo American. This included a discussion of risks to labour rights identified through the Initiative for Responsible Mining Assurance (IRMA) audits and other mechanisms and priorities for action as recommended by the Human Rights Working Group.

Oversight of our policies relating to human rights, including modern slavery and child labour, sits with the Board. Overall accountability for human rights lies with the Strategy & Sustainability function, with other functions (notably, People & Organisation and Supply Chain) and businesses (including Marketing) playing leading roles in managing risks in their respective areas of the business.



Anglo American's Human Rights Working Group was reestablished in 2024 following restructuring of the business in 2023. The multi-disciplinary Human Rights Working Group includes individuals from Environment, Risk, Social Performance, Health and Safety, Sustainability, Legal, Supply Chain and Marketing and considers the lessons learned from managing

potential human rights impacts relevant to Anglo American, and external examples and trends, to identify and prioritise areas for improvement. Discussions included how legislation is driving more detailed expectations on disclosures around modern slavery. Action areas and priorities are discussed with the Board Sustainability Committee.

### Policies and resources

Anglo American has a robust policy framework, which is underpinned by our Code of Conduct and our Values. The implementation of our policies is typically enabled by supporting procedures, guidance documents, toolkits and assurance activities. The policies and resources set out in the table on this page support our human rights (including modern slavery and child labour) risk management.

In 2024, we updated our Responsible Sourcing Standard for Suppliers, our publicly available Standard designed to provide clear and unambiguous guidance to current and prospective suppliers on legal requirements and our expectations to demonstrate fair and ethical business practice. The updated Standard includes explicit messaging from our Group Head of Supply Chain on the role that suppliers should play to eradicate modern slavery within their value chains. It also includes labour and human rights principles for suppliers to Anglo American (further detail are to the right).

Policies and resources	Implementation action	
Code of Conduct		
Incorporates our commitment to respecting labour and broader human rights. This includes our commitment to the International Labour Organization's (ILO) core labour rights, including a zero-tolerance approach to modern slavery, forced labour and child labour.	Our Code of Conduct is available in several languages on our website and intranet. Code of Conduct training is mandatory for all connected employees and contractors and is embedded in employee and key supplier agreements.	
Human Rights Policy		
Reinforces our commitment to human rights and support for the UNGPs. It also sets out our commitment to the ILO's fundamental labour rights, which includes a zero-tolerance approach	Our Human Rights Policy is available on our website and intranet in several languages and is embedded in the Social Way management.	
to forced, bonded and child labour.	In 2024, we conducted an internal gap review of the implementation of our Human Rights Policy based on its integration across functions and business processes.	
Responsible Sourcing Standard for Suppliers		
Designed as a 'Code of Conduct' for suppliers to Anglo American, the Standard was updated to further emphasise action on modern slavery. The updated standard now includes 13 principles and 37 sub-principles to support suppliers to respect labour and human rights, including: not	Our updated Responsible Sourcing Standard is available on our website and is supplemented by a due diligence framework, including supplier self-assessments and third-party audits, which suppliers participate in/complete as required.	
using child labour, opposing unfair or inhumane treatment of the workforce, eliminating irregular	Responsible Sourcing requirements are embedded in all supplier contract templates and	

#### Responsible Commodity Sourcing Policy for Marketing

Builds on our commitment to respect human rights expressed in our Responsible Sourcing Standard to provide additional guidance for our commodity suppliers and intermediaries. The policy requires that commodity suppliers commit to respecting labour and broader human rights, and implement appropriate mechanisms to evaluate and address supply chain-related risks. These include the use of child labour (including, the worst forms of child labour) and all forms of forced or compulsory labour, including other forms of modern slavery, for the metals and minerals they supply to our Marketing business.

employment and acting against modern slavery or other human rights issues in the value chain.

Our Responsible Commodity Sourcing Policy is available on our website. The requirements it sets have been embedded into our Know Your Counterparty (KYC) process in the form of a self-assessment questionnaire which existing sourcing counterparties are in the process of completing. We have developed training materials for internal teams, which we continued to roll out in 2024 through targeted training to our Marketing business.

purchase order conditions. A failure by a supplier to comply with Responsible Sourcing

requirements, including those prohibiting the use of child labour, forced labour and other forms

of modern slavery, constitutes a breach of contract and gives us suspension and termination

rights under the contract. Typically, we would seek to work with a supplier to address any

concerns before seeking to end the supplier relationship.

#### Social Way Policy and Toolkit

Anglo American's Social Way Policy underscores our human rights commitment and is based on leading international reference standards, including the UNGPs. A human rights approach has been applied to the Social Way, which requires all sites to conduct a social and human rights risk analysis (SHIRA) on an annual basis throughout the life of an asset. One of the categories that is included in the SHIRA process is impacts on personal and political security, including the right to freedom from slavery and forced child labour.

Our Social Way Policy and Toolkit are available in English, Portuguese and Spanish on our website and intranet. Throughout 2024, we have been updating and optimising the policy framework, and are planning to finalise an updated Social Way Policy and Standard in 2025. The Policy and Standard are supported by a practitioner toolkit, providing simple practical guidance on how to implement our commitments.

# Training and capacity building

Anglo American strives to enable a continuous learning culture and ensure that our people are supported to build the knowledge and capability needed to help us meet our commitment to respecting human rights, including by addressing modern slavery and child labour risks.

Our Code of Conduct training (which covers our commitment to human rights and labour rights, including addressing modern slavery) is available on our online training platform and is mandatory for all connected employees and contractors.

In 2024, we developed and launched a new online training module on the Code of Conduct. The module covers core elements of the Code of Conduct, including how our Values can be applied in action and how the decision-making tree can be used to navigate difficult situations (including human rights related issues). By the end of 2024,16,973 of our colleagues had completed the training. This was the first year that failure by an employee to complete the mandatory training would result in a 5% bonus reduction.



16,973

of our colleagues completed our Code of Conduct training by the end of 2024

We regularly require all connected employees to complete mandatory human rights training. Usually, this is required every two years; however, due to the current organisational transition, the next scheduled roll-out is planned for 2026. We also completed the roll-out of more tailored modules for specific Group Functions to address risks related to their parts of the business during the reporting period. In 2024, our Marketing team received human rights training provided by an expert third-party advisory firm, outlining the relevance of human rights to the Marketing function, expectations for action, the salient human rights issues identified for Marketing (as outlined in the next section) and the approaches in place to manage these salient human rights issues.

We continue to focus on developing local supplier capacity on responsible recruitment practices and sourcing. This included working with the NGO Stronger Together to deliver in-person supplier workshops on responsible recruitment and responsible sourcing. These workshops were attended by 80 delegates, representing 32 businesses in our Platinum Group Metals business. At a two-day in-person workshop at its Mogalakwena operation in South Africa, we outlined the key labour requirements of South African law and focused content on Responsible Sourcing, including practical steps and management controls to identify and manage compliance risk. The content covered risk trends identified through our supplier due diligence efforts. This included: contracting arrangements, overtime and working hours, fair compensation, workplace safety, child labour testing controls and management of workplace grievances. The 36 companies that attended the workshop included on-site contracting companies and small businesses, helping to support our commitments to inclusive procurement and align with the Initiative for Responsible Mining Assurance (IRMA) requirements.





# Building on our modern slavery hotspot analysis

Our human rights due diligence processes typically cut across the full spectrum of human rights; so, we consider modern slavery as part of a wider human rights scope. To complement this broader focus, in 2022 we identified potential areas of modern slavery risk through a modern-slavery-specific hotspot analysis (detailed below). The analysis supported us in identifying key areas for future work.

The hotspot analysis indicated where the highest potential modern slavery risks are likely to be present, based on risk profile rather than specific incidents. When considered alongside the areas where we have higher levels of leverage (temporary low-skilled labour; site-management services; shipping; project construction), the results enabled us to review our management approach to help ensure we are appropriately targeting our key risks and using our leverage effectively. Work in this area will continue through 2025.

Shipping was one of the risk areas identified through the hotspot analysis and remains an area of focus for us. In 2023, we identified salient human rights issues (including issues relating to modern slavery, forced or bonded labour and child labour) which are potentially associated with our trading and shipping value chains. We built on this work by reviewing the measures in place to address these risks in our value chain. Through the review, we identified our next steps to support continuous improvement are to further embed management measures in systems and processes, including clarifying our monitoring and evaluation approach and understanding the effectiveness of grievance mechanisms.

We also undertook a review of how human rights due diligence is integrated into the company's systems and processes more broadly and identified priority areas to strengthen. This review included the hotspot areas related to management of temporary labour and contracted services on site (e.g., site services and security) and also considered feedback from Initiative for Responsible Mining Assurance (IRMA) audits . The findings were discussed with the Human Rights Working Group to confirm priorities for discussion with the Board, with access to grievance mechanisms for employees of on-site suppliers confirmed as a focus area.

Additionally, our ongoing partnership with the Slave Free Alliance has identified further considerations for the management of the supply chain related modern slavery risks identified in 2022. The supply chain "critical tasks" for 2025 have assigned specific actions and related indicators which prioritise our commitment to eliminating modern slavery.

#### IRMA certification highlights areas for future work

External assurance helps meet customer, investor and government expectations for transparency and accountability with regard to sustainable practices and responsible sourcing. We have, therefore, committed to assess all Anglo American managed mines against leading external standards by 2025 as part of our Sustainable Mining Plan – and IRMA is one of these standards.

In 2024, we released six IRMA reports which documented that most of the Standard's requirements in the 'Fair labour and terms of work' section related to forced labour, child labour and trafficking of persons were either substantially or partially met. Key areas for improvement relate to accessibility of worker grievance mechanisms, and the provision of written and understandable information about wages (overtime rates, benefits, deductions, and bonuses), working hours and collective bargaining agreements for employees of suppliers. Additionally, feedback collected through the IRMA process indicated some examples where lack of a contract or written understandable information about working terms and conditions led to concerns around the right to freely associate, discrimination, and working conditions. While these issues may not typically be associated with modern slavery, they could be the sign of supplier practices that need addressing; as such, they have informed the internal review and consideration of how we can improve our approach in the future.

This includes taking steps to address these findings through implementation of our Contractor Performance Management Framework, and Responsible Sourcing programme, including a focus on grievance mechanisms. Work in this area will continue in 2025 (see Looking Forward section below.)

- ► For more on the IRMA process at Minas-Rio, See Anglo America's Modern Slavery Statement 2023
- For more on how we are implementing IRMA audits,
   See the case study in our 2024 Sustainability Report

### Key modern slavery risk factors (identified in 2022 and remain current)

- Low-skilled labour
- Temporary labour
- Strong pricing competition
- Migrant labour
- Sub-contracting, and complex supply chains
- Sourcing from high-risk geographies

#### **Modern slavery hotspots**

We consider these hotspots, which we have identified previously, remained relevant to our operations and supply chain in 2024, but continue to review how we could be involved in new or evolving modern slavery.

#### Modern slavery risk hotspot

- Temporary low-skilled labour for sites
- Logistics and transport services in high-risk geographies
- Security services
- Site-management services
- Third-party storage facilities, including warehouses and ports
- End-of-life waste management (including demolition + recycling)
- Renewable energy sources, including solar panels + batteries
- PPE and workwear (including uniforms, masks and gloves)
- Tyres and other rubber products
- Fuel, oil and lubricants
- Commodities purchased through spot trades
- Processing of commodities from third parties in high-risk geographies
- Information and communication technology (ICT) equipment and services
- Shipping
- Construction labour and materials

We recognise that our evolving operations and value chain may give rise to other modern slavery risks in addition to those we have currently identified. We regularly monitor our modern slavery risk profile to account for such changes in our operating environment. For example, we acknowledge the modern slavery risks such as forced labour associated with the products and value chains that support the transition to a low-carbon economy.

# Responsible operations

Anglo American has around 87,000 employees and contractors working for us around the world. We support labour rights and recognise our potential to cause or contribute to modern slavery in and around operations through our acts or omissions. As detailed below, we are taking a range of steps to manage these risks.

#### Addressing risks to our workforce

We consider the risk of modern slavery and child labour among our direct employees to be low. This reflects the presence of internal controls, including age verifications at the commencement of employment (through, for example, validating identification documents) and other measures designed to safeguard the rights of employees, as well as our commitment to comply with relevant workplace laws and standards in our countries of operation.

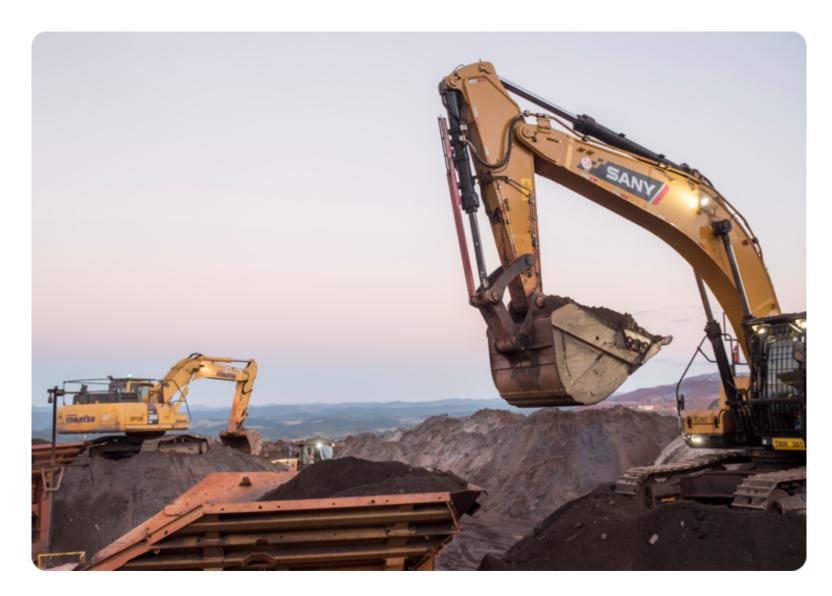
Contractors make up an increasing part of our workforce, and may be at greater risk of human rights impact if similar controls are not in place. In relation to contractors, our Contractor Performance Management Framework provides the foundation for safe and stable production by helping to create a psychologically and physically safe, healthy and productive work environment. Human rights considerations are integrated into the Framework, which can help us manage potential modern slavery risks in relation to our contractors, including minimum labour rights standards that help ensure safe and fair working conditions and opportunities to strengthen contractors' access to grievance mechanisms.

Our updated Responsible Sourcing Standard for Suppliers defines minimum expectations for suppliers and contractors to operate legally and fairly – with added emphasis on the protection of human rights, including combating modern slavery and eliminating child labour. Bolstered in 2024, the updates provide guidance to support further value chain transparency, including the mapping of supplier value chains and reinforcing their role to mitigate risks associated with modern slavery. Requirements for suppliers have been simplified, while highlighting essential controls and behaviours required to demonstrate good practice. Our responsible sourcing programme remains a mandatory requirement for suppliers and is embedded in our supplier onboarding and management processes, supported by contracting arrangements.

#### Addressing risks to communities

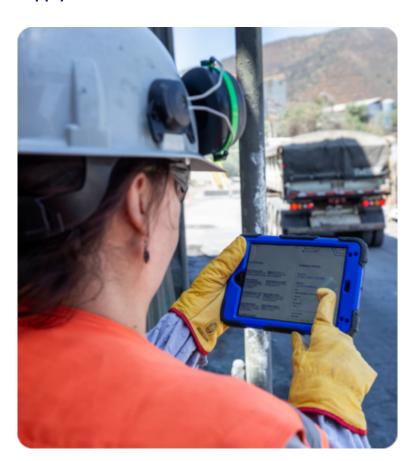
The Social Way Policy and Toolkit requires our operations to conduct Social and Human Rights Impact and Risk Analyses (SHIRAs) as the basis for understanding and managing social and human rights risks and impacts. This is an integrated process that captures a wide range of impacts, including economic, socio-cultural considerations, infrastructure and services, cultural heritage, community health and safety, and personal and political security impacts. One of the categories of impacts identified for management through the SHIRA process covers slavery, forced labour and child labour.

The Social Way Policy and Toolkit also sets out requirements for the management of community grievances and incidents, which could include modern slavery or child labour related concerns.



# Responsible sourcing

Anglo American has an extensive supply chain, including working with more than 13,000 suppliers across multiple geographies. These suppliers vary in reach and complexity, ranging from complex multinational providers of mining goods and services to small-scale, host-community-based suppliers. We recognise that through our relationships with suppliers, there is the potential for us to contribute to, or be directly linked to, modern slavery and child labour within the value chain, and we take a range of steps to manage these risks. We also recognise that our leverage with suppliers to drive action to manage human rights risks such as modern slavery and child labour may vary owing to a range of factors, including our level of spend and whether the supplier is a tier one supplier or is deeper in our supply chain.



We procure a variety of goods and services to support the exploration, mining, transportation, aggregation, processing and technology required for our operations and corporate activities.

In 2024, our operations spent approximately \$13.7 billion with suppliers, of which \$12.1 billion was in countries where we operate, including \$2.3 billion with host communities in the direct vicinity of our operations.

Our approach to host-community spend aligns with national and regional policies that are designed to increase opportunities for previously marginalised groups. We remain committed to principles of inclusive procurement in order to create a more equitable and inclusive supply chain. By focusing on meaningful relationships with host communities and empowering suppliers from marginalised and underrepresented sectors of the economy, we are committed to fostering long-term, sustainable prosperity, potentially reducing some of the structural vulnerabilities that can lead to exploitation, including those related to modern slavery.

For more information on Inclusive Procurement in South Africa,
 See this example from Kumba Iron Ore in the sustainability report

#### Understanding and managing risks

The Responsible Sourcing section of our global website contains our updated Responsible Sourcing Standard for Suppliers, a simplified guide on due diligence expectations from suppliers, introductory videos and a link to the Self-Assessment Questionnaire (SAQ), which identified suppliers are required to complete and routinely update. The SAQ includes questions to confirm workplace practices, other related disclosures on activities to mitigate modern slavery (including forced labour), and other human rights impacts within their value chain. Dependent on the response provided, suppliers will be required to provide evidence of practice, including details on any responsible sourcing assessments previously conducted. Where heightened levels of risk are suspected, suppliers are requested to conduct a new, third-party assessment. Should a Responsible Sourcing risk be identified, including any breaches of the Standard, suppliers are required to inform Anglo American, develop corrective action plans with realistic timelines to address them, and provide feedback on progress.

In our effort to drive an inclusive supply chain, and increase the awareness of customer sustainability requirements, the bespoke SAQ platform remains free to use for suppliers, regardless of their turnover or complexity. We believe that making this tool available and transparent to suppliers, including prospective suppliers, enables these entities to better identify process gaps and practices which may contribute to modern slavery and broader human rights risks.

#### Self-Assessment Questionnaires completed in 2024

There was a significant increase in the number of SAQs completed by suppliers in 2024. A total of 591 (2023: 329) suppliers completed SAQs on our platform.

These suppliers were selected for engagement, as they provide goods and services in categories with higher potential for responsible sourcing risk or have been flagged for potential risk. The types of risks considered include potential modern slavery, mandatory pregnancy testing, unsafe work conditions, environmental practices, underpayment of salaries, excessive working hours and a high number of temporary workers.

In addition to the self-assessments, we conducted 47 (2023: 24) third-party on-site assessments of suppliers. These assessments are conducted by APSCA certified third-party auditors, using audit protocols based on the ILO, the Ethical Trade Initiative (ETI), and country-specific legal requirements.

We have adopted a development approach whereby suppliers are given an opportunity to address breaches and serious non-conformances using a corrective action plan where progress is monitored and unresolved actions escalated if required. Evidence of completion of corrective-action plans is expected from suppliers and, in some cases, we include third-party assessors to confirm action plan close-out. We will continue our efforts through 2025 in order to identify new risk areas and confirm that previously identified risks have been adequately remediated.

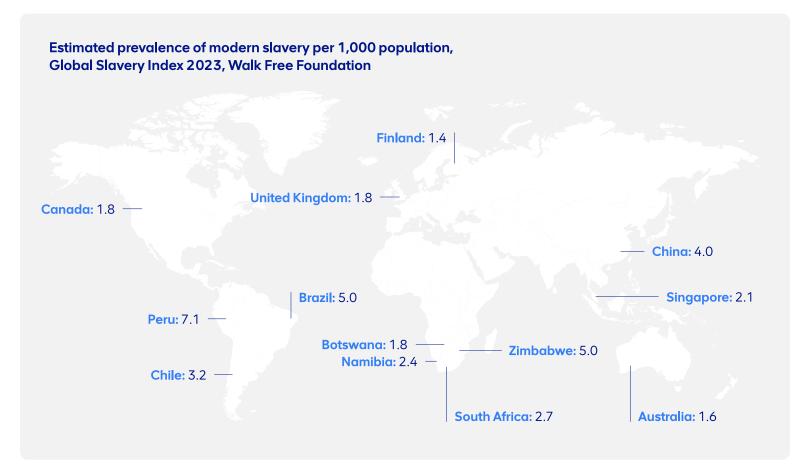
As noted above, in 2024, we commenced a three-year partnership with the Slave Free Alliance, a global NGO that supports organisations to optimise their efforts around responsible supply chain practices and the elimination of modern slavery. Through this partnership, we continue to identify areas for improvement and practices that protect the most vulnerable workers and communities within our wider value chain.

Our Businesses continue to identify those suppliers that have an increased potential for sustainability risk, and use that identification as a basis for informing the level of due diligence undertaken. In 2024, we made several updates to the SAQ platform to automate the provision of guidance on identified risk areas. This approach provides suppliers with an opportunity to understand the risk, then manage the identified issues to limit unintended consequences. If a supplier rejects the recommendations, or is not able to demonstrate progress towards resolution, the matter is then escalated and may result in review of the supply relationship by our Supply Chain Leadership Team.

We did not terminate relationships with any suppliers in 2024, but, through the SAQ responses and audits, identified a number of risks, including related to working hours, wage deductions and contracts. Where issues were flagged in SAQs, suppliers were sent a report with guidance on recommended actions. Where risks were identified at audits, suppliers were issued with Corrective Action Plans (CAP) by the auditors; a routine was then agreed between the auditors and suppliers for information verification.

More broadly, we are also working to enhance our understanding of our extended supply chains below tier one, which we recognise is important to support our current and future due diligence activities. This includes assessing the capabilities of global service providers and enhancing the quality of due diligence and compliance related data (which could include data related to modern slavery). Mapping suppliers beyond the first tier is a complex process, and we will continue to work to build our capacity in this area.

In 2025, we will continue to use a range of insights to identify suppliers with a heightened risk profile; these typically include the intrinsic risk posed by the category of supply, whether the supplier conducts work on or away from an Anglo American site, whether the goods or services require a significant amount of manual work, and region of origin. Where we suspect a risk, our practice is to engage with suppliers, outlining concerns and requiring them to develop a plan of corrective action.



#### Country risk

We use the Global Slavery Index to inform our understanding of responsible sourcing risks in the countries in which our directly managed suppliers are located. In 2024, more than 80% of our total expenditure was with suppliers located in South Africa, Brazil, Chile, Peru, Australia and the UK, although we recognise that the countries in which our directly managed suppliers are located do not always reflect the source countries from which goods and services have been procured by those suppliers.

#### Category risk

We have identified several goods and services we procure as having a higher responsible sourcing risk across several criteria, including in relation to modern slavery and child labour. For example, the procurement of heavy mining equipment, including tyres and blasting equipment, forms a significant portion of our annual spend and our 2022 modern slavery hotspot analysis identified tyres and other rubber products as a potential modern slavery risk hotspot. Since 2023, we have engaged with our strategic managed supplier partners across these categories to enhance supplier due diligence, including around modern slavery risks. We continue to sign memoranda of understanding (MoUs) with our strategic global suppliers, which include commitments to responsible sourcing.

#### Safety risk

Certain goods and services are more reliant on manual labour in their value chains, which is a potential indicator of higher worker safety risk. These include goods and services that are reliant on lifting and rigging, explosives handling and hazardous materials handling. While poor management of worker health and safety standards does not itself constitute modern slavery, it can be seen as an indicator of broader labour rights risk.



#### Our approach to responsible sourcing

Our commitment to responsible sourcing prioritises ethical decision making when purchasing goods and services.

#### Our Responsible Sourcing Strategy consists of four focus areas:



### 1. Progressive standards and policies:

Affirm our non-negotiable requirements and ambition from suppliers, which go beyond compliance.



### 2. Awareness training and capacity building:

Support suppliers and internal teams to meet responsible sourcing requirements.



### 3. Risk-based due diligence:

Ensure that our processes and supplier engagement approach support the identification and management of risk.



### 4. Advocate for wider industry alignment:

Work within the extractive sector to reduce duplication of effort towards shared sustainability outcomes.

#### Supported through:

#### Regular review of standards

Includes consideration of external benchmarks of our Responsible Sourcing Standard and Modern Slavery Statement.

#### Collaboration with strategic suppliers

Includes memoranda of understanding (MoUs) with large-spend suppliers on common ethical value chain objectives.

► See page 20 for additional details.

#### Internal training and awareness drives

Includes capacity-building programmes to support procurement and category teams to embed responsible sourcing practices in daily operations, including in relation to modern slavery.

#### Integration within supplier registration, onboarding and contracting

Ensuring that our supply chain processes create awareness of responsible sourcing requirements.

#### **Building supplier capacity**

Continuing to build capability of suppliers to identify and manage risks, including in relation to modern slavery.

#### Due diligence process

Using a blended approach of internal checks, external databases, SAQs and third-party assessments to provide assurance of controls, including controls for modern slavery.

#### Risk-based supplier engagement

Prioritising for due diligence suppliers in high-risk locations or categories that have higher risk of involvement in severe impacts, which may include modern slavery.

### Risk and incident management process

Formalising the escalation and consequence management linked to supplier risks such as modern slavery.

#### **Engagement with industry-wide initiatives**

Drives standards alignment and mutual recognition, avoiding duplicated effort and cost by sharing existing data.

### Suppliers are expected to:

#### Complete supplier registration and onboarding

As part of the supplier onboarding process, all suppliers are required to comply with relevant laws and commit to Anglo American's Responsible Sourcing Standard requirements as a precondition of working with us. These requirements are also set out in our contract templates and purchase order conditions. This is accompanied by checks which typically include regulatory and compliance-related verifications, security-related validations, and third-party adverse media screenings. Suppliers who refuse to comply with relevant laws and commit to Anglo American's Responsible Sourcing Standard requirements are not engaged.

#### Complete self-assessment questionnaire

Higher-risk suppliers (including those with high-value contracts or within a category which poses potential risk) and suppliers nominated by our Supply Chain team are required to complete a SAQ. The SAQ is a custom tool for supporting the identification of modern slavery and child labour related risks and provides an amalgamated view of risk by addressing industry and country-specific risk indicators. It includes questions related to validating workers' ages, recruitment fees, identity document retention, and loans and advances provided to workers, as well as those related to combating modern slavery within a supplier's supply chain.

#### Provide evidence of third-party assessment

Where issues are identified through review of an SAQ that indicates there is a significant risk associated with a supplier (including in relation to modern slavery and child labour), the supplier is typically required to provide evidence of previously conducted responsible sourcing assessments or requested to conduct a new third-party assessment. Suppliers may also be nominated by the Supply Chain team to undergo a third-party assessment in other circumstances (e.g., if the Supply Chain team determines, through using a heat map, that the goods and/or services to be procured have a higher responsible sourcing risk).

#### Manage risk

Where a responsible sourcing risk, including modern slavery, has been identified, suppliers are typically required to develop corrective actions plans with realistic timelines to address these issues, and provide feedback on progress. As noted above, issues may be escalated if progress to address issues is not demonstrated by a supplier.



# Other responsible business relationships

Anglo American has formal relationships with various stakeholders across the value chain, including suppliers, customers, shareholders, financial institutions, industry associations and joint-venture partners. We recognise that through each of these types of relationships, a mining company could potentially contribute to, or be directly linked to, modern slavery, and we are taking a range of steps to manage these risks.

In addition to our broader procurement activities, the most material business relationships in the context of modern slavery are associated with, but not limited to, our joint-venture partnerships and our Marketing business.

#### **Joint ventures**

Anglo American holds interests in many joint ventures, including both managed and non-managed joint ventures (NMJVs).

A mining company could potentially contribute to, or be directly linked to, modern slavery through its joint ventures or NMJVs.

As NMJVs represent a higher risk, we seek to influence the adoption of a framework commensurate with the requirements of our policies, procedures and standards (including those relating to modern slavery and child labour) and, at a minimum, to comply with local laws and associated requirements.

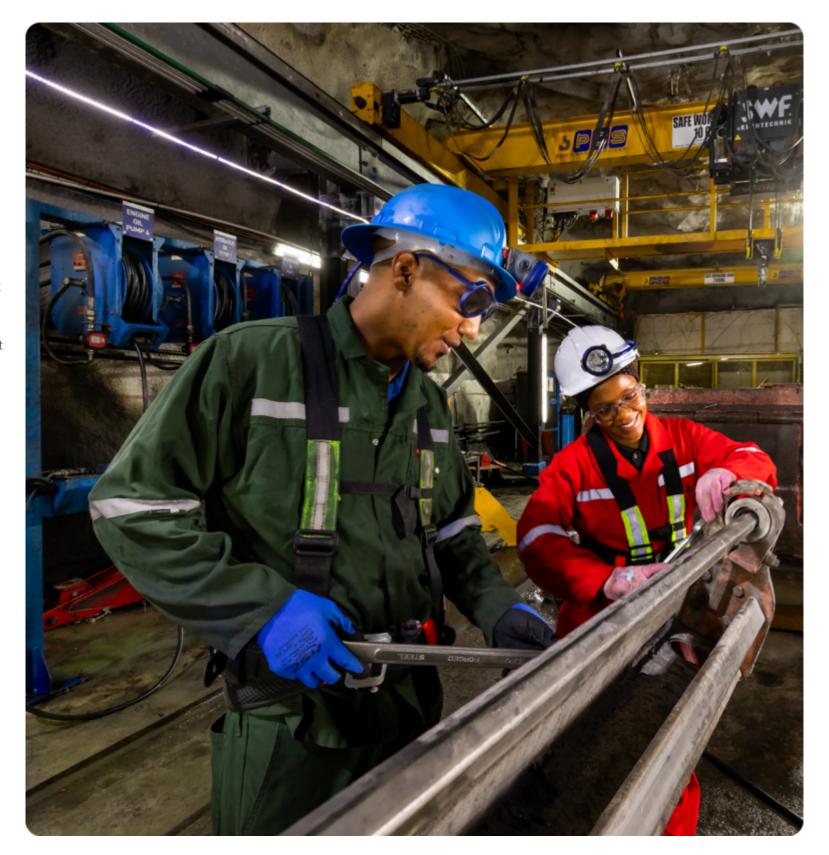
We seek to implement our guidance that sets out our expectations and preferred outcomes for the terms of NMJV agreements, including in relation to human rights (including modern slavery and child labour) issues. This supports us, among other things, in setting clear expectations when entering into new NMJV agreements regarding how human rights (including modern slavery) risks should be managed.

### Marketing business and managing commodity sourcing risks

We endeavour to support our commitment to reliable supply with robust assurance around responsible production. We are building a consistent approach to sustainability risk and opportunity identification (including in relation to modern slavery and child labour) through screening, due diligence and post-deal management processes.

The Marketing business utilises our Responsible Commodity Sourcing Policy, which aids us in identifying and mitigating risks related to the purchasing of third-party mined commodities. This policy provides guidance for our commodity suppliers and intermediaries, informed by the requirements of the OECD Due Diligence Guidance (DDG) for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA).

As noted above, in 2023, our Marketing business commenced a high-level human rights due diligence project with the support of an expert third-party advisory firm to better understand human rights related risks associated with areas covered by the Marketing business (specifically, related to shipping and trading). Implementation of actions identified from this project were put on hold following Anglo American's portfolio simplification focus, which has implications for the Marketing business. The 2024 recommendations will be reviewed to identify priority actions to manage the risks relevant to the updated Marketing strategy.



#### Counterparty due diligence

Our 'Know Your Counterparty' (KYC) procedure assesses factors including ESG and legal risks and ethical business conduct. Additionally, as a pre-condition of a mineral-supplier contract, we request that all mineral suppliers complete a selfassessment questionnaire which includes human rights and supply chain transparency questions. The process also makes a wider analysis based on 21 indicators, including human rights and other ESG issues.

This is done prior to onboarding, as well as at the renewal of an existing contract term, or as needed during the lifecycle of the business relationship. Supporting evidence is provided by the supplier, which is assessed along with a review of publicly available supplier documentation, when available.

In addition to our KYC process, we have put in place a consistent and comprehensive approach to sustainability due diligence across our structured origination deals. Our structured origination sustainability framework applies across the deal lifecycle and includes screening and due diligence activities. Risk indicators related to modern slavery (including forced labour) and child labour are some of the categories assessed during the screening phase of the framework. For business development activities that relate to the permanent acquisition of an asset, similar screening takes place through a SHIRA.

#### Responsible divestment and separation

As part of the divestments under way in our portfolio simplification, we have considered the ESG credentials (health and safety, human rights, social, and environmental) and management experience of prospective buyers. This due diligence has been undertaken alongside the assessment of a potential buyer's financial and technical capabilities as appropriate.

#### The KYC process

#### Initial screening

Marketing counterparties are screened for adverse news through a third party. While the adverse news screening does not specifically focus on modern slavery, it does include specific search filters on various issues which may relate to modern slavery.



#### Due diligence and risk classification

Higher-risk counterparties, including those acting as intermediaries in a trading relationship, are also required to complete a questionnaire. As part of the questionnaire, they are required to state and provide evidence on whether they comply with relevant human rights and Modern Slavery legislation or equivalent laws which involve the prohibition of child labour; forced, bonded or involuntary prison labour; inhumane treatment of the workforce (including physical, sexual, or verbal abuse, bullying or any other forms of intimidation); and human trafficking. These counterparties will be required to confirm if they place requirements or expectations on their third parties (e.g., suppliers, sub-contractors and business partners) to identify and manage risks in relation to human rights (including modern slavery). Based on the questionnaire responses, counterparties are given a risk score of either low, medium, or high risk.



#### Enhanced due diligence

High-risk counterparties are assessed on a case-by-case basis, and enhanced due diligence is conducted. If any red flags or risk factors are confirmed, the counterparty is expected to provide an explanation of how these have been resolved/mitigated.



#### **Risk mitigation**

In the event that risks identified through the enhanced due diligence process are not adequately managed, counterparties are required to develop corrective action plans, with realistic timeframes for addressing the risks. This could include risks relating to modern slavery.



Seafarers standing in front of Ubuntu Liberty, one of Anglo American's 10-strong chartered fleet of Capesize+ Liquefied Natural Gas (LNG) dual-fuelled bulk carriers.

### Respecting labour rights with the Mission to Seafarers

The shipping industry has made significant progress in respecting human rights through regulatory improvements, industry initiatives, technological advancements and increased advocacy. However, working conditions, welfare and lack of legal protection remain an ongoing concern. Many maritime workers spend a great deal of their time in international waters, out of reach of authorities on land. This adds to the challenges posed by the fragmented nature of shipping activities due to varying regulations and enforcement standards across different jurisdictions.

As part of our commitment to respecting human rights everywhere in our value chain, we are a partner of the Mission to Seafarers, which is committed to the welfare and support of seafarers worldwide. The organisation offers a comprehensive range of services, including welfare support, advocacy for seafarers' rights, emergency response assistance, and the operation of seafarer centres in over 200 ports across 50 countries. Our shipping team is also able to utilise the Mission's established network of seafarer centres, and its visits to vessels, which allow us to gather further knowledge of potential human rights concerns on board.

One issue of focus for the Mission to Seafarers is working hours. The ILO's Maritime Convention (as amended, 2006) informs the Mission's approach and all members acknowledge that adequate rest periods must be respected in line with the Convention. The Convention also includes requirements around the elimination of all forms of forced or compulsory labour and the effective abolition of child labour. As part of the Know Your Counterparty process, our Marketing business has developed specific questions relating to seafarers' rights. We request potential counterparties providing shipping services to respond to these questions by providing information and tangible evidence that help us to understand how they prevent and mitigate any potential issues. After the initial onboarding, the process is refreshed and executed on an annual basis. Additionally, every vessel presented to our shipping desk by our chartering or commodity teams must undergo a thorough vetting procedure to ensure compliance with comprehensive set of maritime regulations and adherence to human rights standards on board. Our safety and technical operations team may also actively visit selected chartered vessels when in port or anchorage to conduct inspections, support external audits and engage with crew.

## Remediation processes

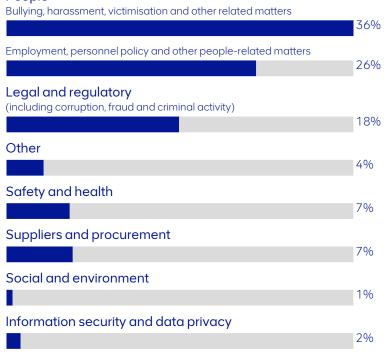
In line with our Human Rights Policy, where we identify that we have caused or contributed to adverse human rights impacts (including modern slavery or child labour), we will co-operate in or provide for their remediation as appropriate, in line with the expectations in the UNGPs.

Our Whistleblowing Policy sets out our approach to reporting issues and concerns confidentially or, if preferred, anonymously. Anglo American does not tolerate any form of retaliation against anyone raising or helping to address a concern. This policy also outlines the availability and use of our YourVoice confidential reporting service, which empowers employees, contractors, suppliers and other stakeholders to raise concerns anonymously about potentially unethical, unlawful or unsafe conduct or practices that conflict with our Values and Code of Conduct. Concerns related to human rights (including modern slavery, forced labour and child labour) can also be raised through YourVoice, which is operated by an independent multilingual whistleblowing service provider.

During 2024, we received 1,376 reports through the YourVoice channel, a similar number to the 1,403 reports received in 2023. A total of 1,430 allegations were closed during the course of the year, which included intakes from prior years. Of the closed allegations, 22% were substantiated or partially substantiated.

All YourVoice reports are assessed and investigated as appropriate by a dedicated investigation team based across the Group. The team uses a standardised investigation framework. Appropriate actions were taken by management against substantiated allegations, in accordance with our policies, resulting in 186 sanctions against employees and contractors, which included 86 exits from the organisation.

# Breakdown of YourVoice reports received (%)<sup>(1)</sup> People



(1) Computational discrepancies may occur due to rounding.

In addition to YourVoice, through our Social Way Policy, sites are required to implement grievance management procedures, and all grievances must be screened. As stated in the Social Way Toolkit, site-level mechanisms should follow the effectiveness criteria for operational-level grievance mechanisms in the UNGPs. External stakeholders, including contractors, can report grievances and incidents that have a social consequence through a site-level mechanism. One of the categories of incidents that can be reported is personal and political security, which includes incidents related to the right to freedom from slavery, forced and child labour, and debt bondage. Grievances and incidents of a higher social consequence level would be escalated to Group level. In 2024, no slavery, forced or child labour impacts were identified through the grievance process.

Our Responsible Sourcing Standard for Suppliers requires suppliers to provide or allow access to a grievance mechanism, including YourVoice.

In 2024, we received no modern slavery related allegations or reports via YourVoice, and no issues reached the threshold for escalation from our site-level grievance mechanisms. We recognise that a lack of allegations or reports of modern slavery does not of itself mean that modern slavery is not present in our operations and supply chains.

During 2024, we worked on the development of an integrated dashboard for grievances and incidents with social consequences. This will allow for improved analysis and management of grievances and incidents, and will enable us to report more accurate and granular data. We aim to analyse more information on the total numbers of different types of grievances across our operations, learnings from those, and, where relevant, the corrective and remedial actions taken to address significant issues.

# Engagement and collaboration

Healthy stakeholder relationships help us to better understand and communicate how our business decisions, activities and performance are likely to affect or be of significant interest to our stakeholders and provide the opportunity to co-create effective and lasting solutions to business and other challenges, such as modern slavery.

As identified in our 2024 Sustainability Report, key stakeholder groups for Anglo American continue to include investors, employees, communities, suppliers and contractors, customers, civil society (NGOs, faith groups and academia), governments and multilateral institutions and industry associations. Matters with potential human rights implications, such as climate change, water, taxation, health and safety, livelihoods, transparency, community development and equality, are regularly discussed in engagements with relevant stakeholder groups. Human rights as a dedicated topic of discussion takes place most frequently with civil society, suppliers and contractors, customers and investors. Our social performance teams also regularly engage with communities, formally through community engagement forums, or informally through direct outreach activities. These engagements provide opportunities for our teams to identify any potential human rights issues and, if necessary, escalate them to ensure they are addressed.

#### Engagement with stakeholders on human rights and modern slavery related matters

Stakeholder Approach

Startenoide	Approach		anian rights related matters diseased
Investors	Through our investor relations team, we have an active engagement programme with key financial and sustainability audiences, including institutional shareholders.	a.	Sustainability, including climate change, water, nature and biodiversity, human rights, and safety, as well as the possible impact of the portfolio simplification on our sustainability strategy and targets
Employees	We use various formats to connect leadership with workforce priorities. This may include surveys, focus group sessions and through the various working groups supported by the People & Organisation function. In addition, our Global Workforce Advisory Panel meets during the year to discuss a range of topics.	a. b.	Physical and psychological safety and health Job security
			Organisation and workforce restructuring
	Every business has structures and routines in place for engagement with representative trade unions, and material matters are routinely escalated to appropriate leadership committees. In 2024, we had one dialogue session and a number of parallel engagements with	c. d.	The future of work
		e.	Inclusion and diversity
	IndustriALL. In South Africa and Australia, our Tripartite structures (comprising businesses, recognised trade unions, the government regulatory bodies and industry councils) met to continue its focus on topics primarily related to health and safety.	е.	inclusion und diversity
Communities	Guided by our Social Way, we commit to local accountability that forms part of our Sustainable Mining Plan and sets our standard for how we proactively engage with local stakeholders. We aim to always engage proactively, meaningfully and respectfully with our stakeholders	a.	Community health and safety
		b.	Livelihoods and job creation
	in relation to impacts and risks and to maximise socio-economic development opportunities. The principles of informed consultation and participation are at the heart of our stakeholder engagement activities, focusing on an in-depth exchange of views and information in an	C.	Land access, displacement and resettlement
	organised and iterative process that is tailored to different stakeholders, including potentially vulnerable groups.	d.	Socio-economic development initiatives
		e.	Grievances and incidents which could significantly affect local stakeholders
		f.	Cultural heritage
		g.	Collaboration in emergency preparedness planning
Suppliers and contractors	We engage with suppliers through several channels, including: supplier relationship management programmes, engagement events, host-community procurement forums, capability development initiatives, various digital platforms, and our responsible sourcing programme.	а.	How to identify and mitigate the risk of modern slavery and labour rights abuses within the supplier value chain
		b.	Through our Contractor Performance Management programme, protecting the safety, health, well-being and dignity of all workers employed by contracting companies
Customers	Our Marketing business engages with customers through direct personal engagements and via business and industry forums.	a.	Decarbonisation roadmap and carbon management solutions
		b.	Assurance that products have been responsibly mined or sourced
		C.	Collaboration opportunities
		d.	Participation in responsible mining certification systems
Civil society	Our engagement includes one-on-one interactions (including with Executive Leadership Team members); various multi-stakeholder	a.	Climate change and just transition
(NGOs, faith	initiatives and partnerships; addresses at civil society gatherings; and open and ongoing dialogue on tax transparency, the future of	b.	Respect for human rights
groups and academia)	resource taxation and responsible mining practices. The Group hosts accountability dialogues which bring together a cross-section of stakeholders to discuss our performance. Any key concerns or trends from these engagements are reported to relevant executive and/or Board structures. These trends and issues inform our strategies, policies and procedures.  We participate in the global Mining and Faith Reflections Initiative and the South African multi-faith Courageous Conversations initiative, and also have longstanding partnerships with NGOs such as TechnoServe, Fauna & Flora International, Right to Care, HBGI and The Global Fund.	C.	Our impact on water and biodiversity
		d.	Avoiding/mitigating environmental harm, and the right to a healthy environment
		e.	Investing in social and community development
		f.	Critical raw materials supply chains
		g.	Ethical value chains/product provenance
		h.	Free, prior and informed consent.
Governments and multilateral	We engage proactively with host governments at both local and national levels, as well as with other governments in countries of strategic interest – both directly and through industry bodies, and via participation in inter-governmental and multilateral processes.	a.	Stable, secure supply of responsibly sourced critical raw materials for the energy transition in an increasingly challenging geopolitical context
institutions		b.	Wider sustainability and development agenda, including climate change
		C.	Contribution to national and international developmental priorities
Industry associations	We participate in more than 130 industry associations worldwide. An audit of our memberships is undertaken and published biennially.  Our participation is directed by our Government and International Relations Policy.	a.	Contributing constructively in business initiatives, with the aim of enhancing the collective business interest
associations	· · · · · · · · · · · · · · · · · · ·		
associations		b.	Contributing to shared responses to challenges faced by governments and societies in host jurisdictions and markets

Human-rights-related matters discussed

# Assessing the effectiveness of our approach

We recognise that assessing the effectiveness of our overall approach and specific actions is a critical component of our response to modern slavery and is key to continuous improvement.

For Anglo American, an effective approach to managing modern slavery risks includes having:

- Clear policies that set modern-slavery-related expectations of personnel and business partners across the value chain.
- Robust due diligence processes to identify, mitigate and account for how modern slavery risks are addressed.
- Processes to enable the remediation of any modern slavery related incidents which we identify we have caused or contributed to, including grievance mechanisms that align with the UNGPs' effectiveness criteria for non-judicial grievance mechanisms.

In 2024, quantitative measures we used to track the effectiveness of our modern slavery approach included:

- Number of engagements with our Human Rights Working Group.
- Number of SAQs requested and completed by suppliers.
- Number of supplier audits.
- Percentage of suppliers with agreed corrective action/ improvement plans.
- Number of suppliers assessed for social impacts.
- Number of suppliers on capability development programmes.
- Percentage of employees who completed Code of Conduct training.
- Number of YourVoice cases received and issue type.

We also monitor third-party benchmarks and other reporting about the quality of modern slavery statements in Australia and the United Kingdom. In 2024, the Churches, Charities and Local Authorities (CCLA) investment management company updated its UK Modern Slavery Benchmark based on points allocated across 48 questions related to: Modern Slavery Act compliance and registry, conformance with the UK's modern slavery guidance, and a "find it, fix it, prevent it" framework. Anglo American was assessed at the same level as in 2023 (Level 2 on a scale of 1-5, where Level 1 is leading practice) which was categorised as "Evolving Best Practice", where the Benchmark found "Evidence" of human rights due diligence practices on modern slavery informed by experts and/or civil society partners. There is evidence of activity in the find it, fix it, and prevent it categories". We are currently reviewing gaps highlighted through the benchmark to determine appropriate action for future disclosures.

Additionally, our approach to management of risks to human rights is reviewed through internal Social Way assessments, and as part of third-party assurance reviews taking place at specified sites.

Our broader governance processes also include mechanisms that assist us to monitor our effectiveness. For example, Anglo American's modern slavery and child labour risk management performance is tracked as part of the Group's human rights programme by the Sustainability and Strategy function.

In 2025, we will continue to work to strengthen how we track the effectiveness of our modern slavery and child labour approach, including monitoring and accountability.

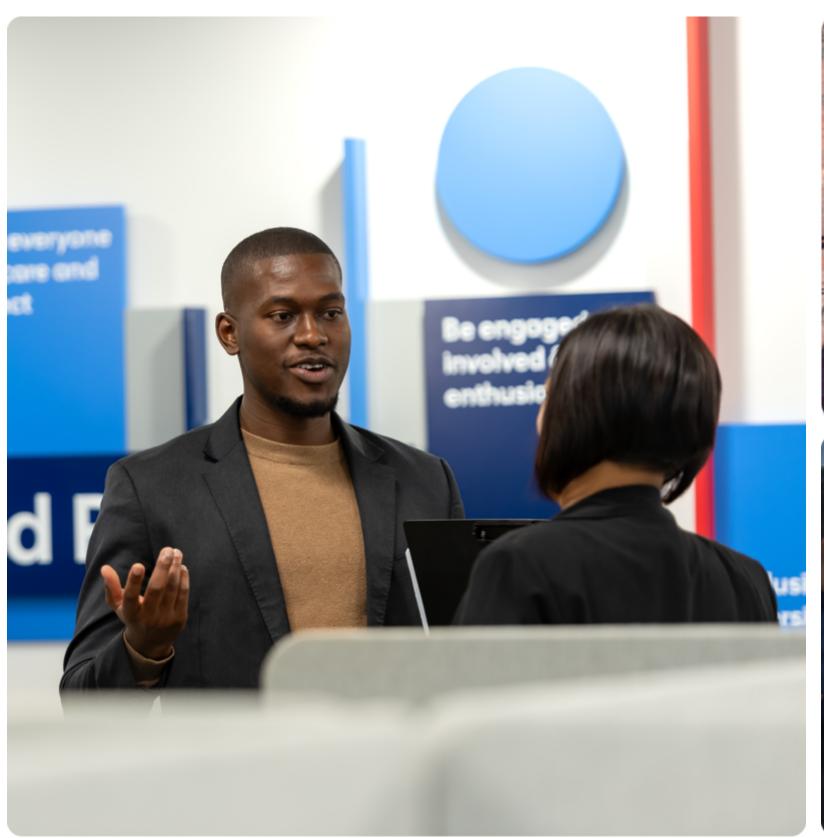


# Looking forward

Despite not identifying any incidents in 2024, we recognise the nature of our industry, the countries where we operate and source from, and the categories of goods and services we procure, mean there is still potential for modern slavery risks. In 2025 and beyond, we will continue to strengthen our approach to identify, assess, and address modern slavery risks in our operations and supply chains.

#### Focus areas for 2025 and future years

- Updating our Code of Conduct and confirming our human rights commitments remain fit-for-purpose.
- Developing new materials to support the implementation of our updated Responsible Sourcing Standard for Suppliers, including through ongoing supplier due diligence, and capability development.
- Improving consistency in monitoring supplier risk and closeout of actions.
- Further embed labour rights due diligence in Shipping management systems and processes, including clarifying the monitoring and evaluation.
- Prioritise actions for ongoing human rights due diligence in Marketing.
- Progressing work to gain to gain greater clarity in oversight for contractors' labour rights, including resolution of grievances.
- Defining roles and responsibilities for modern slavery and child labour risk management through the organisational transition.







# Appendix I – Reporting entities

Entity	Description
UK MSA reporting entities	
Anglo American plc (company number 03564138)	Global mining company listed on the London, Johannesburg, Swiss, Botswana and Namibia stock exchanges.
Anglo American Services (UK) Ltd (company number 02295324)	Principal activity is an investment holding company and provides management services to certain companies in the Group.
Anglo American Marketing Limited (company number 00405724)	Principal activity is the sale of nickel, copper, and iron ore to international customers, as well as the provision of sales services for various commodities produced by the Group or sourced from third parties, and the provision of marketing and other supporting services for certain companies in the Group.
Anglo Platinum Marketing Limited (company number 06726161)	Principal activity comprises the sale of platinum group metals and associated by-products to international customers.
Anglo American Technical & Sustainability Services Limited (company number 11352289)	Provides management, technical and consultancy services to certain companies in the Group.
Kumba International Trading Limited (company number FC035694)	Principal activity is the sale of iron ore to international customers in Europe, as well as to its subsidiary Kumba Singapore Pte Ltd which in turn sells the iron ore to customers in China and other countries in Asia Pacific region. Some additional sales are made by the Company to customers in Africa, the Americas and the Middle East.
Australian MSA reporting entities	
Anglo American Technical & Sustainability Services Limited (company number 11352289)	Provides management, technical and consultancy services to certain companies in the Group.

# Appendix II – How our statement addresses the UK MSA and Australian MSA reporting criteria

UK MSA recommended reporting criteria	Australian MSA mandatory reporting criteria	Reference in this Statement
N/A	Identify the reporting entity.	About this statement (page 02)
		Appendix I ( <u>page 25</u> )
Organisation's structure, its business and its supply chains.	Describe the reporting entity's structure, operations, and supply chains.	About this statement (page 02)
		Our business at a glance ( <u>page 05</u> )
		Our business model ( <u>page 06</u> )
		Tier one supplier locations ( <u>page 07</u> )
		Identifying, assessing and addressing modern slavery and child labour risks (pages 16–17)
The parts of its business and supply chains where there is a risk of slavery and	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Embedding our commitments (page 09)
human trafficking taking place, and the steps it has taken to assess and manage that risk		Identifying, assessing and addressing modern slavery and child labour risks (pages 13-23)
*Note: steps taken to assess and manage that risk are also described below.		
Its policies in relation to slavery and human trafficking	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Summary ( <u>page 04</u> )
		Embedding our commitments (pages 08–12)
Its due diligence processes in relation to slavery and human trafficking in its business and supply chains	and remediation processes.	Identifying, assessing and addressing modern slavery and child labour risks ( <u>pages 13–23</u> ),
The training about slavery and human trafficking available to its staff.		
Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how the reporting entity assesses the effectiveness of such actions.	Assessing the effectiveness of our approach (page 23)
N/A	Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	About this statement ( <u>page 02</u> )
N/A	Include any other information that the reporting entity, or the entity giving the	Message from the Chief Executive ( <u>page 03</u> )
	statement, considers relevant.	Looking forward ( <u>page 24</u> )
	statement, considers relevant.	Looking forward (page 24)

### Contacts and other information

#### Group terminology

In this document, references to "Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our" are to refer to either Anglo American plc and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities or persons. The use of those generic terms herein is for convenience only, and is in no way indicative of how the Anglo American Group or any entity within it is structured, managed or controlled. Anglo American subsidiaries, and their management, are responsible for their own day-to-day operations, including but not limited to securing and maintaining all relevant licences and permits, operational adaptation and implementation of Group policies, management, training and any applicable local grievance mechanisms. Anglo American produces Group-wide policies and procedures to ensure best uniform practices and standardisation across the Anglo American Group but is not responsible for the day to day implementation of such policies. Such policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions where appropriate, and for implementation, oversight and monitoring within their specific businesses.

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### Comments or queries related to this report

Jonathan Dunn

Head of Climate and Human Rights

#### **Other Anglo American publications**

Integrated Annual Report

Tax and Economic Contribution Report

Climate Change: Our plans, policies and progress

Modern Slavery Statement

Voluntary Principles on Security and Human Rights

UK Gender Pay Gap Report

Transformation Performance Report

Ore Reserves and Mineral Resources Report

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